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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIAM J. O'REILLY,

a/k/a WILLIAM J. O'REILLY JR

Defendant.

CASE NO. 4:25-mj-70481

AMENDED NOTICE OF PROCEEDINGS ON
OUT-OF-DISTRICT CRIMINAL CHARGES
PURSUANT TO RULES 5(c)(2) AND (3) OF THE
FEDERAL RULES OF CRIMINAL PROCEDURE

Please take notice pursuant to Rules 5(c)(2) and (3) of the Federal Rules of Criminal Procedure that on April 28, 2025, the above-named defendant was arrested pursuant to an arrest warrant (copy attached) issued upon a

☐ Indictment

☐ Information

☒ Criminal Complaint

☐ Other (describe) _____

pending in the Northern District of New York, Case Number 8:25-MJ-72 (GLF).

In that case (copy of complaint attached), the defendant is charged with a violation of Title 8,

FILED

Apr 29 2025

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

1 U.S.C. § 1324(a)(1)A)(v)(1).

2 Description of Charges: Conspiracy to Bring Aliens.

3 The maximum penalties are as follows: 10 years' imprisonment, \$250,000 fine, 3 years'
4 supervised release, and a \$100 special assessment.

5
6 Respectfully Submitted,

7 PATRICK D. ROBBINS
8 Acting UNITED STATES ATTORNEY

9 Date: April 29, 2025

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11 MAUREEN C. BESSETTE
12 Assistant United States Attorney
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Attachment

UNITED STATES DISTRICT COURT

for the

Northern District of New York

United States of America

v.

WILLIAM J. O'REILLY

a.k.a. WILLIAM J. O'REILLY JR.

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)

Case No. 8:25-MJ-72 (GLF)

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
 (name of person to be arrested) William J. O'Reilly,
 who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

8 USC 1324(a)(1)(A)(v)(I) - Conspiracy to Bring Aliens into the United States.

Date: MARCH 18, 2025

 Issuing officer's signature
City and state: Plattsburgh, New York
Hon. Gary L. Favro, U.S. Magistrate Judge
 Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

U.S. DISTRICT COURT – N.D. OF N.Y.

FILED**Mar 18 - 2025**

John M. Domurad, Clerk

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURTfor the
Northern District of New York**UNITED STATES OF AMERICA****v.****WILLIAM J. O'REILLY****a.k.a. WILLIAM J. O'REILLY JR.****Defendant.****Case No.** 8:25-MJ-72 (GLF)**CRIMINAL COMPLAINT**

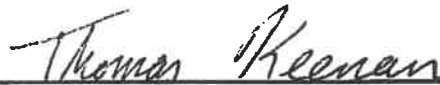
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Between on or about October 29, 2024, through on or about November 10, 2024, in the county of St. Lawrence in the Northern District of New York, the defendant violated:

Code Section
8 U.S.C. § 1324(a)(1)(A)(v)(I)

Offense Description
Conspiracy to Bring Aliens

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.*Complainant's signature*

HSI Special Agent Thomas Keenan

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: MARCH 18, 2025*Judge's signature*City and State: Plattsburgh, New York

Hon. Gary L. Favro, U.S. Magistrate Judge

Printed name and title

Continuation Sheet, *United States v. WILLIAM J. O'REILLY*

This criminal complaint is based on these facts:

On November 13th, 2024, Coconspirator-1 was arrested and charged with 8 U.S.C. § 1324(a)(1)(A)(v)(I)-Conspiracy to Bring Aliens.

Coconspirator-1 stated an individual, whom investigators later determined to be William J. O'REILLY, would contact Coconspirator-1 and other individuals when aliens needed to be smuggled into the United States from Canada. Coconspirator-1 stated individuals who wanted to be smuggled into the United States would contact O'REILLY. In turn, O'REILLY would contact Coconspirator-1 or other un-named coconspirators to arrange smuggling. Coconspirator-1 stated he believed some of the "Irish" (the aliens being smuggled) were involved with criminal activity. Once Coconspirator-1 and other coconspirators transported the aliens to the United States from Canada, the aliens would move to other locations. Coconspirator-1 stated aliens mostly went to New York City, but also said some aliens were transported to Boston.

After obtaining a search warrant for Coconspirator-1's mobile cellular phone, law enforcement uncovered numerous text messages, voice messages, and voice calls between Coconspirator-1 and O'REILLY. In summary, on at least one occasion, O'REILLY informed Coconspirator-1 that he would need to prepare a boat to smuggle aliens from Canada into the United States. Coconspirator-1 would ask O'REILLY how many people would be transported and would make appropriate arrangements for transportation and boat space. Coconspirator-1 was paid in cash for his role. The aliens would have cash on their person when they were smuggled and would give the cash to other coconspirators. Coconspirator-1 would receive cash payment after the fact from coconspirators who received the cash from the aliens.

The investigation has determined, after interviews with additional co-conspirators and reviews of additional cellular phones, that O'REILLY was acting in a leadership role of an alien smuggling enterprise spanning the United States and Canada.